

# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

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August 7, 2008

OK

TO: Internal File

THRU: James D. Smith, Permit Supervisor *DS 08/12/08*

FROM: Steve Christensen, Environmental Scientist II *SKC*

RE: Coal Mine Waste Sale & Haul to COVOL, Consol Coal Company, Emery Deep, C/015/0015, Task ID #3020

### SUMMARY:

On July 28<sup>th</sup>, 2008, Consolidation Coal Company (the Permittee) submitted an amendment to the Division of Oil, Gas and Mining (the Division). The amendment provides additional language to the Placement and Handling of Materials section of the approved MRP (See Chapter II, Page 22).

The amendment discusses the agreement between the Permittee and Covol Engineered Fuels, L.L.C (Covol). The Permittee proposes to haul the existing coalmine waste to the Covol site. The hauling of the material will last approximately 2 weeks with approximately 80% of the piles volume leaving the Emery Mine site.

The amendment should be approved at this time.

### TECHNICAL ANALYSIS:

## OPERATION PLAN

## SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

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**Analysis:**

**Coal Mine Waste**

The amendment meets the Coal Mine Waste requirements of the State of Utah R645-Coal Mining Rules.

The Permittee has entered into an agreement with Covol Engineered Fuels, LLC (Covol) to haul the existing coal mine waste to their DOGM permit pending site in Wellington, Utah for processing and sale. The operation will consist of scalping a scalping screen to size the material on site and a front-end loader to load onto over the road trucks. The Permittee estimates that the operation will take approximately 2 weeks.

The oversize material that remains on the Consol site will be re-compacted and tested for compaction per Consol's MSHA permit. No new disturbance is anticipated as a result of this activity. The Permittee estimates that the size of the piles could be reduced by as much as 80%.

**Findings:**

The amendment meets the Coal Mine Waste requirements of the State of Utah R645-Coal Mining Rules.

**RECOMMENDATIONS:**

The amendment should be approved at this time.